



Regulatory Advisory

March 2008, Revised



TRU Advisory: 08-01 (Revised)

USING MODEL YEAR TO DETERMINE TRU ATCM COMPLIANCE DATE

Background

At its February 2004 public hearing, the California Air Resources Board (ARB) approved the *Airborne Toxic Control Measure for In-Use Diesel-Fueled Transport Refrigeration Units (TRU) and TRU Generator Sets, and Facilities Where TRUs Operate* (TRU ATCM). The TRU ATCM is designed to use a phased approach over about 15 years to reduce the diesel particulate matter (PM) emissions from in-use TRU and TRU generator set engines that operate in California. As adopted, the compliance dates for meeting the in-use performance standards of this regulation are based on engine model year.

What is the issue?

New TRUs, produced in January, February, or March, are typically equipped with engines from the prior model year. For example, TRUs manufactured in January 2008 are usually equipped with model year 2007 engines. TRU owners believe they lose up to a year of useful life before TRU ATCM compliance is required when they take delivery of a new TRU that was manufactured in the first few months of a calendar year, if that unit is equipped with an engine of the prior model year. In order to maximize useful life, many customers are likely to wait for the engines with a model year matching the unit manufacture year. This would result in disruption of the production cycle for several months, and that would negatively impact the availability of new TRUs.

What are ARB's policies?

The manufacture year of the TRU unit may be used instead of the TRU engine model year to determine the TRU ATCM in-use performance standards that must be met and the related compliance dates; however, the TRU unit manufacture year shown on the unit label can be no more than one year later than the TRU engine model year shown on the engine label. If the difference is greater than one year, then the engine model year shall be used in accordance with the TRU ATCM. Table 1 displays the in-use performance standards and compliance dates required by the TRU ATCM. Examples of how this policy may be applied are listed below:

1. A TRU that is manufactured in 2002 with a model year 2001 engine may use 2002 to determine the in-use performance standard requirements and compliance date. In this case, the Low-Emission In-Use Performance Standard (LETRU) shall be met by December 31, 2009, and the Ultra-Low-Emission In-Use Performance Standard (ULETRU) shall be met by December 31, 2016 (see line 2, Table 1).
2. A TRU that is manufactured in 2003 with a model year 2002 engine may use either 2002 or 2003 to determine the in-use performance standard requirements and compliance date. If 2002 is used, LETRU must be met by December 31, 2009, and ULETRU must be met by

December 31, 2016 (see line 2, Table 1). If 2003 is used, ULETRU must be met by December 31, 2010 (see line 3, Table 1).

3. A TRU that is manufactured in 2008 with a model year 2007 engine may use 2008 to determine the in-use performance standard requirements and compliance date. In this case, ULETRU shall be met by December 31, 2015 (see line 8, Table 1).
4. A TRU that is manufactured in 2008 with a model year 2006 engine shall use 2006 to determine the in-use performance standard requirements and compliance date (note that there is more than one year between the unit manufacture year and the engine model year). In this case, ULETRU shall be met by December 31, 2013 (see line 6, Table 1).

If the owner complies with the TRU ATCM in-use performance standard by retrofitting with a Verified Diesel Emissions Control Strategy (VDECS), the engine model year shown on the engine label shall be used to determine engine compatibility with the VDECS, in accordance with the Executive Order for that VDECS.

When the owner of a TRU applies for an ARB Identification Number (IDN), the engine model year that is shown on the engine label shall be entered on the IDN application.

Table 1
In-Use Performance Standard Compliance Dates

Ref. Line	Model Year	In-Use Performance Standard Compliance Date	
		LETRU	ULTRU
1	2001 and older	December 31, 2008	December 31, 2015
2	2002	December 31, 2009	December 31, 2016
3	2003	Does Not Apply	December 31, 2010
4	2004	Does Not Apply	December 31, 2011
5	2005	Does Not Apply	December 31, 2012
6	2006	Does Not Apply	December 31, 2013
7	2007	Does Not Apply	December 31, 2014
8	2008	Does Not Apply	December 31, 2015
9	2009	Does Not Apply	December 31, 2016
10	2010	Does Not Apply	December 31, 2017
11	2011	Does Not Apply	December 31, 2018
12	2012	Does Not Apply	December 31, 2019
13	2013	Does Not Apply	December 31, 2020
14	2014	Does Not Apply	December 31, 2021

Note: If new 25 to 50 hp engines meet the 0.02 grams per hp-hour emissions standard (Tier 4-Final), they will meet ULETRU.

For more information

To obtain a copy of the regulation or other related compliance assistance documents, visit the TRU website at <http://www.arb.ca.gov/diesel/tru.htm>. Additional questions may be addressed by calling the toll-free TRU Help Line at 1-888-878-2826 (1-888-TRU-ATCM).